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July 9, 2015

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The Honorable Analisa Torres
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Marathon Asset Management, LP v. Wilmington Trust, N.A.*, Case No.
1:15-cv-04727 (AT)(AJP)

Dear Judge Torres:

We represent Angelo Gordon & Co., LP, Apollo Advisors VII, L.P., and Brookfield
Asset Management Private Institutional Capital Adviser (Canada), L.P. (collectively the
"Intervenor Defendants"). We respectfully submit this letter to request the Court's approval to
submit a single, consolidated brief in opposition to plaintiff Marathon Asset Management LP's
("Marathon") motion to remand and in support of the Intervenor Defendants' motion to transfer
venue. We believe that this approach would be more efficient for the Court and the parties,
given the overlapping issues and facts involved in the various motions. Marathon has no
objection to this request.

We also request that the Intervenor Defendants' and defendant Wilmington Trust's time
to respond to the complaint be deferred until two weeks after the Court rules on one or more of
the pending motions. We respectfully submit that it would be more efficient for the defendants
to respond to the complaint once the Court determines whether it has jurisdiction over this matter
and the proper forum in which this matter will proceed. Marathon consents to this request.

We appreciate Your Honor's consideration of these requests.

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Respectfully Submitted,

/s/ Jonathan Rosenberg

Jonathan Rosenberg
Partner
of O'MELVENY & MYERS LLP

JR

cc: All Counsel of Record